

Harvis & Fett

GABRIEL P. HARVIS
BAREE N. FETT

May 19, 2016

BY ECF

Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Cortes v. City of New York, et al.*, 14 CV 3014 (SLT) (RML)

Your Honor:

I represent plaintiff in the above-referenced civil rights action. I write pursuant to the Court's order dated April 26, 2016, on behalf of the parties, to provide the Court with the below schedule for the remaining depositions. Additionally, the parties respectfully request an extension of the discovery deadline from June 29, 2016 until July 15, 2016, to accommodate the below schedule.

Deponent	Date
Sergeant Stephen Daly	May 31, 2016
Police Officer Christopher Musa	June 1, 2016
Police Officer Shaun Ryan	June 7, 2016
Police Officer Dominic Ruggiero	June 9, 2016
Police Officer Sadiq	June 14, 2016
Police Officer Matthew Smith	June 27, 2016
Police Officer Mario Cappuccia	June 29, 2016

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Deponent	Date
Police Officer Andrew Schulz	July 1, 2016
Police Officer Caruso	July 13, 2016
Police Officer John Cestaro	July 15, 2016

In accordance with above schedule, the parties respectfully request that the current discovery deadline of June 29, 2016 be extended until July 15, 2016.

Thank you for your consideration of this request.

Respectfully submitted,

Gabriel P. Harvis

cc: ACC Elissa Jacobs, Esq.